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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,  
MICK CLEARY, EUGENE ALVIS, and  
JENNIFER NELSON, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 5:20-CV-07956-VKD

**JOINT STIPULATION TO  
EXTEND CASE DEADLINES AND  
[PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

1 Pursuant to this Court’s Case Management Order (ECF No. 99) and Civil L.R. 6-2,  
2 Plaintiffs Joseph Taylor, Edward Mlakar, Mick Cleary, and Eugene Alvis (“Plaintiffs”) and  
3 Defendant Google LLC (“Google”) (collectively, the “Parties”), by and through their respective  
4 counsel, hereby stipulate and agree as follows:

5 **WHEREAS**, counsel for Plaintiffs and Google in this matter are also concurrently  
6 handling the *Csupo v. Google LLC* matter in the Complex Litigation Division of Santa Clara  
7 County, which raises materially the same claims at issue in this litigation but on behalf of a  
8 California class (“*Csupo*”);

9 **WHEREAS**, on April 9, 2025, the Parties previously stipulated to the following deadlines,  
10 which were approved in the Court’s April 10, 2025 scheduling order (ECF No. 189): (1) July 8,  
11 2022 for the Parties’ reply briefs for their respective expert challenge motions and for Plaintiffs’  
12 reply brief for their class certification motion, and (2) July 22, 2025 for the hearing on the  
13 foregoing motions;

14 **WHEREAS**, given the unexpected length of jury trial proceedings in the parallel *Csupo*  
15 action, in which all counsel for the Parties here are involved, the Parties previously stipulated to  
16 an extension of the briefing deadlines to July 22, 2025, and requested the hearing on the foregoing  
17 motions be set for August 11 or 12, 2025 (ECF No. 202);

18 **WHEREAS**, this Court entered the Parties’ stipulation and set the hearing on the foregoing  
19 motions for August 12, 2025 (ECF No. 203);

20 **WHEREAS**, the Parties have been conferring regarding time-sensitive post-trial matters  
21 in *Csupo* that have arisen as a result of a jury verdict for the plaintiffs in that case, including  
22 appellate bond issues, post-trial briefing, and injunctive relief;

23 **WHEREAS**, the Parties have set an aggressive post-trial briefing schedule in *Csupo* to  
24 comply with state statutory deadlines;

25 **WHEREAS**, the Parties are also preparing for a post-trial hearing in *Csupo* on injunctive  
26 relief and other issues, set for July 25, 2025;

27 **WHEREAS**, the Parties jointly request an extension, as set forth below, of the briefing  
28 deadlines and the hearing date for their pending motions, and agree that good cause exists to grant

the requested extensions for the following reasons;

**WHEREAS**, the Parties respectfully submit that good cause exists to modify the scheduling in this matter because of conflicts in schedules between the current matter and in *Csupo* as described above;

**WHEREAS**, additional time may allow the Parties to resolve this case by settlement, thereby conserving judicial resources;

**WHEREAS**, in order to avoid conflicting deadlines with the *Csupo* case and the risk of rushed efforts that could detract from the Parties' ability to present the most helpful briefing and presentations to this Court, the Parties believe that an adjustment to the current case schedule—while maintaining the current trial date—is necessary and would serve in the interests of judicial economy and efficiency,

**NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and agree that the following revisions should be made to the case schedule:

Event	Current Deadline	Stipulated Deadline
Class Certification and Expert Challenges Replies	July 22, 2025	July 29, 2025
Class Certification and Expert Challenges Hearing	August 12, 2025	August 19, 2025 (pending Court's availability)
Motions for Summary Judgment	September 30, 2025	October 3, 2025
Motions for Summary Judgment Oppositions	October 28, 2025	October 31, 2025
Motions for Summary Judgment Replies	November 18, 2025	November 21, 2025

Motions for Summary Judgment Hearing	December 9, 2025	December 16, 2025 (pending Court's availability)
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**IT IS SO STIPULATED.**

Dated: July 18, 2025

Respectfully submitted,  
COOLEY LLP

By: /s/ Whitty Somvichian  
Whitty Somvichian

Attorney for Defendant  
GOOGLE LLC

Dated: July 18, 2025

KOREIN TILLERY LLC

By: Pamela Yaacoub  
Pamela Yaacoub

Attorney for Plaintiffs

**ATTESTATION OF CONCURRENCE IN FILING**

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests that concurrence in the filing of this document has been obtained.

1 Dated: July 18, 2025

Respectfully submitted,

2 KOREIN TILLERY LLC

3 /s/ Pamela Yaacoub

4 Marc A. Wallenstein (*pro hac vice*)

George A. Zelcs (*pro hac vice*)

5 Ryan Z. Cortazar (*pro hac vice*)

Chad E. Bell (*pro hac vice*)

6 Pamela Yaacoub (*pro hac vice*)

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**PROPOSED ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Virginia K. DeMarchi  
United States District Judge